



Graves Garrett LLC

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September 1, 2020

VIA ECF

Hon. Lewis J. Liman
Daniel Patrick Moynihan
United States Courthouse
Courtroom 15C
500 Pearl Street
New York, New York 10007

Re: Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, 18-cv-2185 (LJL)

Dear Judge Liman:

On behalf of and with the consent of all parties, who communicated by telephone on August 31, 2020, regarding this letter motion,¹ we write to request a status conference with the Court to seek guidance on two items.

First, the four phases of the parties' summary judgment briefing (scheduled pursuant to the Court's order at ECF 259) are now completed. The parties seek the Court's guidance about the delivery of paper copies of the briefing, which the parties acknowledge is extensive. Cognizant of the Court's individual rules of practice issued at the beginning of the pandemic, we have not attempted to deliver the paper copies to chambers. At the conference, we will ask the Court's guidance whether there is an alternative location for delivery of the materials.

Second, we will ask the Court for clarification regarding the current October 5, 2020, deadline for the Joint Pretrial Order and the related filing deadlines. Any claims or defenses of the parties remaining after resolution of summary judgment would be tried before a jury, and we have reviewed the July 6, 2020, order of the Southern District of New York indicating that, in Phase II of its Phased Re-Entry Plan, jury trials have been suspended.

¹ In accordance with No. 1(B) of the Court's Individual Practice in Civil Cases.



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We look forward to discussing these matters with you when the Court's schedule will permit a conference.

Respectfully submitted,

A handwritten signature in black ink that reads "Edward D. Greim".

Edward D. Greim

Counsel for Defendant/Counterclaimant Strategic
Vision US, LLC

cc: Counsel of record via ECF